

Deverie J. Christensen
Nevada State Bar No. 6596
Phillip C. Thompson
Nevada State Bar No. 12114
JACKSON LEWIS P.C.
3800 Howard Hughes Pkwy, Suite 600
Las Vegas, Nevada 89169
Tel: (702) 921-2460
Email: deverie.christensen@jacksonlewis.com
Email: phillip.thompson@jacksonlewis.com

*Attorneys for Defendant
National Security Technologies, LLC*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRENDA OSSEWEIJER,

Plaintiff,

vs.

NATIONAL SECURITY TECHNOLOGIES,
LLC, a Delaware Limited Liability Company;
and, DOES I-X; and ROE CORPORATIONS
I-X, inclusive,

Defendants.

Case No. 2:18-cv-01699-MMD-NJK

**DEFENDANT'S REQUEST FOR
EXCEPTION FROM ATTENDANCE
AT EARLY NEUTRAL EVALUATION**

Defendant National Security Technologies, LLC ("Defendant") by and through its counsel Jackson Lewis P.C., respectfully requests an exception to the early neutral evaluation ("ENE") attendance requirements. Specifically, Defendant requests that Defendant's insurance carrier be excused from attending the ENE in person. Should the Court require, the carrier representative can be available by telephone.

This request for exception is based on the fact that although Defendant is insured with AIG, Defendant has a substantial, six-figure self-insured retention and any resolution of this matter at the ENE will be funded by Defendant. In addition, the representative for AIG is located out of state and would be required to incur significant time and expense to travel to the ENE when

1 the settlement value of this case is well within the amount of Defendant's self-insured retention.
2 The insurance representative's absence will not adversely affect the ENE, and those present will
3 have the appropriate settlement authority to reach a reasonable resolution at the ENE.

4 Based on the foregoing, Defendant respectfully requests Defendant's carrier be excused
5 from in person attendance at the ENE currently scheduled for December 19, 2018, at 9:30 a.m.
6 Should the Court require, the carrier representative will be available telephonically.


7 Dated this 18th day of October, 2018.

8 JACKSON LEWIS P.C.

9
10 /s/ Deverie J. Christensen
11 Deverie J. Christensen, Bar #6596
12 Phillip C. Thompson, Bar #12114
13 3800 Howard Hughes Parkway, Suite 600
14 Las Vegas, Nevada 89169

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16 *Attorneys for Defendant*
17 *National Security Technologies, LLC*

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19 **IT IS SO ORDERED** this 24th day of
20 October, 2018.

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23 Peggy A. Leen
24 United States Magistrate Judge
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Jackson Lewis P.C., and that on this 18th day of October, 2018, I caused to be served via the Court’s CM/ECF Filing, a true and correct copy of the above foregoing **DEFENDANT’S REQUEST FOR EXCEPTION FROM ATTENDANCE AT EARLY NEUTRAL EVALUATION** properly addressed to the following:

James P. Kemp
Victoria L. Neal
Kemp & Kemp
7435 W. Azure Drive, Ste. 110
Las Vegas, Nevada 89130

Attorneys for Plaintiff
Brenda Osseweijer

/s/ Emily Santiago
Employee of Jackson Lewis P.C.

4826-3962-1241, v. 1